

SWORN COMPLAINT BEFORE THE TEXAS ETHICS COMMISSION

An individual must be a resident of the state of Texas to be eligible to file a sworn complaint with the Texas Ethics Commission. The complainant is required to attach to the complaint a copy of one of the following documents:

- complainant's driver's license or personal identification certificate issued under Chapter 521 of the Transportation Code, or commercial driver's license issued under Chapter 522 of the Transportation Code; or
- a utility bill, bank statement, government check, paycheck or other government document that shows the name and address of the complainant and is dated not more than 30 days before the date on which the complaint is filed.

Effective September 1, 2009, an individual may also be eligible to file a sworn complaint with the Texas Ethics Commission if the individual owns real property in the state of Texas. Under this provision, the complainant will be required to attach to the complaint a copy of a property tax bill, notice of appraised value, or other government document that shows the name of the complainant, shows the address of the real property in Texas, and identifies the complainant as the owner of the real property.

OFFICE USE ONLY	
Docket Number	
Date Hand-delivered or Date Postmarked	

I. IDENTITY OF COMPLAINANT

1 COMPLAINANT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
Mr. CRAIG Mc DONALD			
2 COMPLAINANT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #:	CITY; STATE; ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
609 W. 18th St. E Austin TX 78701			
3 COMPLAINANT MAILING ADDRESS	ADDRESS	APT / SUITE #:	CITY; STATE; ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
<input checked="" type="checkbox"/> (check if same as above)			
4 COMPLAINANT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	5 COMPLAINANT E-MAIL ADDRESS		
512 472.9790			TPJ@TPJ.ORG

II. IDENTITY OF RESPONDENT

6 RESPONDENT NAME	MS / MRS / MR	FIRST	MI
	NICKNAME	LAST	SUFFIX
MR. Rick Perry			
7 RESPONDENT POSITION OR TITLE	GOVERNOR		
8 RESPONDENT PHYSICAL ADDRESS	ADDRESS	APT / SUITE #:	CITY; STATE; ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
STATE Capitol, Rm 25.1 Austin TX 78701 1100 Congress			
9 RESPONDENT MAILING ADDRESS	ADDRESS	APT / SUITE #:	CITY; STATE; ZIP CODE
	(Full home or business address, including street, city, state, and zip code)		
<input checked="" type="checkbox"/> (check if same as above)			
10 RESPONDENT TELEPHONE NUMBER	AREA CODE	PHONE NUMBER	EXT
	11 RESPONDENT E-MAIL ADDRESS (IF KNOWN)		
512 463.2000			unknown

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III. Nature of Alleged Violations

Respondent Governor Rick Perry is seeking reelection in November 2010.

- 1) It appears that Rick Perry, through his primary political committee, Texans for Rick Perry (TEC # 00015741), violated Section 254.031 of the Texas Election Code. Section 254.031 (a) (3) requires that campaign expenditure reports include “the amount of political expenditures that in the aggregate exceed \$50 and that are made during the period, the full name and address of the persons to whom the expenditures are made, and the dates and purposes of the expenditures.”
- 2) Between January 2001 and February 2010, Texans for Rick Perry’s disclosure reports have listed 145 “Mansion Fund” expenditures that add up to a total of \$816,000.
- 3) These lump sum “Mansion Fund” expenditures do not comply with Section 254.031 because they fail to itemize the ultimate, true recipients of the funds, the dates and amounts of the underlying payments, as well as the purposes of the un-itemized expenditures.

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IV. Statement of Facts

Between January 2001 and February 2010 Texans for Rick Perry's campaign finance reports list at least 145 "Mansion Fund" expenditures that add up to \$816,000.

The "Mansion Fund" appears to be an account administered by the governor's staff and used to pay for certain political and/or officeholder expenses incurred for activities at the Governor's Mansion (including the "temporary mansion").

A "The Mansion of Governor Rick Perry" ledger supplied by the Governor's office lists checks paid to various vendors and details the amounts, dates and purposes of the payments. The ledger lists checks written between October 2007 and December 2009.

Yet, the "Mansion Fund" expenditures reported to the TEC by Texans for Rick Perry do not reveal the ultimate payee, the exact amounts of actual payments or the dates and purposes of the underlying payments. As such, the campaign appears to have violated Texas Election Code disclosure requirements.

Specifically, over the past two years Texans for Rick Perry has filed five campaign reports listing 29 "Mansion Fund" expenditures that total \$100,936. Those reports are:

- 1) Report # 379968, July 15, 2008, with seven "Mansion Fund" expenditures totaling \$32,206.
- 2) Report #400343, January 15, 2009, with six "Mansion Fund" expenditures totaling \$18,000.
- 3) Report #422778, July 15, 2009, with eight "Mansion Fund" expenditures totaling \$26,730.
- 4) Report #43897, January 15, 2009, with six "Mansion Fund" expenditures totaling \$18,000.
- 5) Report #444658, February 22, 2010, with two "Mansion Fund" expenditures totaling \$6,000.

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V. LISTING OF DOCUMENTS AND OTHER MATERIALS

List all documents and other materials filed with this complaint. Additionally, list all other documents and other materials that are relevant to this complaint and that are within your knowledge, including their location, if known.

1. Copies (partial) of five Campaign finance reports filed by Texas for Rick Perry between July 2008 and Feb. 2010 listing 29 "Mansion Fund" expenditures.

2. Copy of ledger titled "The Mansion of Rick Perry, Checks Written" covering Oct 2007 through Dec 2009.

ATTACH ADDITIONAL PAGES AS NEEDED

**VI. AFFIDAVIT
BASED ON PERSONAL KNOWLEDGE**

(Execute this affidavit if the acts alleged are within your direct personal knowledge.)

I, _____, complainant,
swear that I am a resident of the state of Texas. I swear that I have knowledge of the
facts alleged in this complaint and that the information contained in this complaint is
true and correct.

Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said _____, this the _____ day of
_____, 20 _____, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed name of officer administering oath

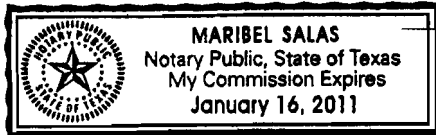
Title of officer administering oath

**VII. AFFIDAVIT
BASED ON INFORMATION AND BELIEF**

(Execute this affidavit if the acts alleged are not within your direct personal knowledge, but are based on reasonable belief.)

I, CRAIG Mc DONALD, complainant,
swear that I am a resident of the state of Texas. I swear that I have reason to believe
and do believe that the violation alleged in this complaint has occurred. The source
of my information and belief is

public documents.



Craig McDonald
Signature of Complainant

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said Craig McDonald, this the 16th day of
June, 20 10, to certify which, witness my hand and seal of office.

Maribel Salas
Signature of officer administering oath

Maribel Salas
Printed name of officer administering oath

Notary Public
Title of officer administering oath